

Committee's work at market rates. The Committee has opted to use the Laffey matrix as the measure of market rates in seeking their fees. Like the rates of private firms, rates based on the Laffey matrix are presumptively reasonable. See, e.g., Blackman et al. v. District of Columbia, et al., No. 97-1629, 2000 U.S. Dist. LEXIS 20970, *6-7 and n.1 (Sept. 13, 2000 D.D.C.); Trout v. Vall, 705 F. Supp. 705, 709 n.10 (D.D.C. 1989); see also Thompson, 2002 U.S. Dist. LEXIS at *35 (recognizing Laffey rates as customary in the District of Columbia). In prior fee petitions, the Washington Lawyers' Committee has sought and obtained Laffey Rates for the work it has performed on behalf of prevailing clients. See, e.g., Bolden v. J & R Inc., 135 F. Supp. 2d 177 (D.D.C. 2001). **Without the reductions discussed below, the Committee's fees would be \$ 62,482.**

15. **The Committee is seeking compensation for a total of 199.58 hours of time expended, which is valued at \$44,425 (rounded to the nearest dollar).** Contemporaneous billing records reflecting the time expended on this case by Ms. Susan Huhta, Ms. Carolyn Weiss, and Ms. Brandi Brown for which compensation is sought are included in Exhibit 2 to this declaration. The breakdown of that time by the categories delineated in Appendix B is as follows:

Case development/investigation:	hours: 11:02	Total: \$ 2,101.67
Pleadings:	hours: 20:07	Total: \$ 4,407.58
Written Discovery:	hours: 43:53	Total: \$ 9,687.42
Depositions:	hours: 19:48	Total: \$ 4,349.50
Motions Practice:	hours: 2:00	Total: \$ 535.00
ADR:	hours: 63:57	Total: \$ 14,408.25
Fee Petition:	hours: 38:48	Total: \$ 8,936.00